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July 7, 2025

Via ECF

Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Giannakoulis v. Department of Education of the City of New York
25-cv-01670-CLP

Dear Judge Donnelly:

This office represents the Plaintiff in the above-referenced matter. The Defendant filed a pre-motion letter to dismiss on June 23, 2025 (Dkt. No. 9). I write to respectfully request that Plaintiff be allowed to amend the complaint in lieu of responding to Defendant's Pre-Motion letter for a conference in anticipation of making a Motion to Dismiss. The parties have conferred in good faith. Defendant is not objecting to Plaintiff amending the complaint. This is Plaintiff's first request in this Court to amend the complaint.

Rule 15a also provide that courts, 'should freely give leave [to amend] when justice so requires.'" Kroshnvi v. U.S. Pack Courier Servs. Inc., 771 F.3d 93, 109 (2d Cir. 2014)(quoting Fed. R. Civ. P. 15(a)(2)). Justice so requires absent factors, "such as undue delay, bad faith or dilatory motive on the part of the movant...undue prejudice to the opposing party by virtue of allowance of the amendment, [or] futility of the amendment, etc.," which are wholly absent here. Forman v. Davis, 371 U.S. 178, 182 (1962).

Plaintiff proposed that it be allowed to amend her complaint within fourteen days of the order granting Plaintiff leave to file an amended complaint, and that the Defendant be given 20 days to response to the amended complaint.

I thank the Court for its consideration herein.

Respectfully submitted,

s/ Stewart Lee Karlin
Stewart Lee Karlin, Esq.

cc: Andrea Martin (via ECF)